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July 31, 2020

**VIA ECF**

William T. Walsh, Clerk  
United States District Court  
For the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street Room 4015  
Newark, New Jersey 07101

**Re: Emerson Redevelopers Urban Renewal, LLC  
v. Borough of Emerson  
Civil Action No. 20-cv-4728-MCA-MAH**

Dear Mr. Walsh:

This firm is counsel to plaintiff Emerson Redevelopers Urban Renewal, LLC, in the above-captioned matter. Pursuant to Local Civil Rule 7.1(d)(5), we request an automatic extension of the time to respond to a dispositive motion with respect to the Motion to Dismiss filed by Defendant the Borough of Emerson on July 20, 2020. Currently, Plaintiff's opposition briefing is due on August 3, 2020, and the motion is returnable August 17, 2020. The originally noticed motion day has not previously been extended or adjourned. The new motion date shall be September 8, 2020, the deadline for Plaintiff to file opposition papers shall be August 25, 2020, and Defendant's reply papers shall be due on September 1, 2020.

Thank you for your consideration in this matter.

Respectfully yours,

s/ Joseph B. Fiorenzo  
Joseph B. Fiorenzo

Cc: All counsel (Via ECF)